

**Department of Energy****Ohio Field Office
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(513) 648-3155****OCT 30 1997****DOE-0054-98**

**Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590**

**Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911**

Dear Mr. Saric and Mr. Schneider:

**PROPOSED CERTIFICATION STRATEGY FOR EASTERN OFF-PROPERTY AREA
(MR. SUMME'S PROPERTY) AND PROPOSAL TO AMEND OPERABLE UNIT 5
REMEDIAL DESIGN WORK PLAN TO OUTLINE OVERALL OFF-PROPERTY CERTIFICATION
STRATEGY AND SCHEDULE**

The purpose of this letter is to present, for your review and approval, our proposed certification strategy for the eastern off-property area, which is owned by Mr. Summe, and a proposal to amend (through a letter) the Operable Unit 5 (OU5) Remedial Design Work Plan (RDWP) to outline the overall off-property certification strategy and schedule. Our proposed strategy will use a phased approach that will first identify off-property soil contamination that is above off-property soil Final Remediation Levels (FRL), as established in the OU5 Record of Decision (ROD), to facilitate the necessary discussions between Department of Energy (DOE) and the Environmental Protection Agency (EPA) and the respective landowners to enable decisions to be made regarding the appropriate path forward to address any off-property remediation needs and/or any needed certification evaluations. An off-property area will be certified clean when the off-property contaminants of concern are exhibited to be statistically below the off-property soil FRLs established in the OU5 ROD. The strategy outlined in this letter for Mr. Summe's property, as well as the overall strategy which will be added to the OU5 RDWP as an amendment, is based on the Sitewide Excavation Plan (SEP) currently under regulatory review.

Extensive soil sampling was conducted during the OU5 Remedial Investigation (RI) to characterize the nature and extent of contamination from past Fernald Environmental Management Project (FEMP) operations. Data from these investigations show that

contamination is widespread on the FEMP property and limited, isolated contamination is also present in off-property soil along the eastern property boundary, and in the soils and associated rip-rap used to stabilize the original effluent line at the Great Miami River. However, based upon the off-property surface soil data from the OU5 RI, extensive soil excavations are not expected.

In general, in order to determine the extent of off-property soil contamination above off-property soil FRLs and to complete the certification process, the DOE proposes a sampling and measurement approach for the pre-certification and certification processes as defined in the SEP. During pre-certification the off-property area will be scanned with in-situ radiological characterization equipment (for example, the mobile Radiation Tracking System (RTRAK or RSS) and/or the tripod-mounted High Purity Germanium detector system (HPGe) to identify areas containing elevated surface contamination levels. Any necessary excavations based on surface scan results will be conducted during the pre-certification phase in order to remove soil with contamination above the FRLs. Final certification of a particular off-property area is currently envisioned to rely on physical samples, as per our recent discussions. Based on the results of the pre-certification activities as well as the current land use scenarios, the depth and location of physical samples will be determined and provided in a draft Certification Design Letter (CDL), which will be submitted for your review and approval. Upon approval of the CDL, certification sampling, analysis, and additional excavation (if necessary) will then be conducted.

The certification of all applicable off-property areas will be scheduled on a priority-based, phased approach considering both anticipated contamination levels and adjacent landowner concerns. The tentative plan (based on funding) for Mr. Summe's property (adjacent to the FEMP's eastern property boundary starting from just north of the Sewage Treatment Plant and extending to State Route 126) is to certify the northern half (adjacent to the Area 1, Phase I remediation area) by the end of Fiscal Year (FY) 1998. The southern half of his property would then be certified within one year after the Area 1, Phase II remediation area is certified. The enclosed figure outlines this phased approach.

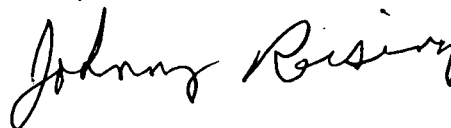
Generally, priorities for off-property certification will be based on historic air deposition patterns, timing of activities for on-property soil excavation and certification, and adjacent landowner and stakeholder comments or concerns. The DOE-FEMP recognizes that the overall off-property remediation and certification approach was not presented in the OU5 RDWP (August, 1996). As a result, the DOE-FEMP proposes to amend the RDWP to (1) present the overall off-property remediation (if necessary) and certification approach, including identifying the specific areas off-property which would be evaluated and (2) provide a schedule for the submittal of the associated draft area-specific CDL(s). The CDL(s) would, in turn, present the schedule dates for the follow-on Certification Report(s).

The proposed off-property certification process, whether for Mr. Summe's property or other future areas, will include three or four documents (depending on if any remediation is necessary) and, generally, three distinct phases of work with each phase including the appropriate EPA review and comment time. The four guiding documents for this process include: 1) Project Specific Plan for pre-certification (still envisioned to be handled on an informal basis but provided to EPA with adequate time to review and comment); 2) Excavation Plan (if necessary); 3) CDL; and 4) Certification Report. The Project Specific

Plan will detail the initial pre-certification activities including area delineation COCs selection, radiological scan, and result interpretation. If determined necessary, based on in-situ radiological survey results along with existing data, an Excavation Plan will be prepared detailing the remediation process for areas which require excavation. The draft CDL will define the certification units and sampling locations for final certification purposes. A draft Certification Report will be submitted as the final step in the certification process to demonstrate that the remedial action objectives are completed.

If you have any questions or concerns regarding this approach, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Nickel

Enclosure: As Stated

cc w/enc:

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